<u>REMARKS</u>

In this Response, claims 1, 2, 4-7, 13, 16-17, 19, 21-24, 30, 33, 34, 36, 37, 39-41, 47, 50, 51, 53, 54, 56, 59, 65, 68, 69, 72-74, 76, 77, 79-82, 87, 88, 91 and 92 have been amended. Claims 18, 35, 52, 71, 75, and 93 were previously canceled. Claims 1-17, 19-34, 36-51, 53-70, 72-74, and 76-92 are currently pending, of which claims 1, 19, 36, 53, 72, 73, 74, and 76 are independent. No new matter has been added.

I. **Claim Amendments**

Independent claims 1, 36, 72, 73, and 76 are amended to recite that the controller system includes "at least two free-running data modules." Dependent claims 2, 4-7, 13, 16-17, 37, 77, 80-82, 88, 91 and 92 are amended to recite "free-running data modules." Support for these amendments may be found in the Specification, at least on page 14, line 26 to page 15, line 10.

Independent claims 19, 53, and 74 are amended to recite that "each of the at least two data modules operating in one of a free-running mode or a triggered mode, wherein a data module operating in triggered mode starts data collection when a trigger event occurs and stops data collection when a stop event occurs, the trigger event being external to the data module, the stop event being internal to the data module." In addition, claim 19 recites that the controlling by the at least one controller is performed "between the starting and the stopping of the first set" and claims 53 and 74 recite that the controlling by the at least one controller is performed "between the starting and the stopping of the two or more of the data modules." Support for these amendments may be found in the Specification, at least on page 14, line 26 to page 15, line 10.

Claims 2, 37, and 77 are amended to recite that each of the two or more of the data modules "includes a display of the data collected by that free-running data module" and that "the snapshot function freez[es] the display of the data collected at the free-running data module that executes the snapshot function." Claim 54 is amended to recite that each of the two or more of the data modules "includes a display of the data collected by that data module" and "the snapshot function freez[es] the display of the data collected at the data module that executes the snapshot function." Support for these amendments may be found in the Specification, at least on page 17, line 29 to page 18, line 5.

Claims 4, 21, 39, 56, and 79 are amended to recite "manipulating at least one of the frozen displays of data collected while data continues to be collected." Support for these amendments may be found in the Specification, at least on page 25, lines 20-23.

Independent claims 19 and 36 are amended to recite "a first set of two or more of the data modules" instead of "two or more of the data modules." Dependent claims 22-24, 30, 33, 34, 37, 40, 41, 47, 50, and 51 are amended to be consistent with the amendments to claims 19 and 36. Support for these amendments may be found at least in the prior versions of claims 19 and 36.

Claim 22 is amended to recite that "the second set differing from the set by at least one data module." Claim 37 is amended to recite that "the second set differing from the set by at least one free-running data module." Support for these amendments may be found in the Specification, at least on page 18, lines 11-17.

The remaining claim amendments are discussed below with respect to the claim objections and the 35 U.S.C. § 112 rejection.

No new matter has been added.

II. **Claim Objections**

The Examiner objected to claims 72-74, which recited the phrase "initializing the simulation environment."

Applicant has amended claims 72-74 to recite "initializing the simulation application," as the Examiner has suggested.

Accordingly, Applicant respectfully requests the Examiner to withdraw the objection to claims 72-74.

III. **Summary of Claim Rejections**

Claims 7, 13, 24, 30, 41, 47, 59, 65, 82, and 87 are rejected under 35 U.S.C. § 112, second paragraph, as being indefinite for failing to particularly point out and distinctly claim the subject matter which Applicant regards as the invention.

Claims 1, 5-6, 8, 13-14, 36, 40, 42, 47-48, 72, 74, 76, 80-81, 83, and 88-89 are rejected under 35 U.S.C. § 102(e) as being anticipated by U.S. Patent Application Publication No. 2004/0093197 by Billemaz et al. (hereinafter "Billemaz").

Claims 2-4, 7, 12, 15, 19-25, 29-32, 37-39, 41, 46, 49, 73, 77-79, 82, 87, and 90 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Billemaz, in view of U.S. Patent No. 6,088,029 to Guiberson et al. (hereinafter "Guiberson").

Claims 9, 43 and 84 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Billemaz, in view of U.S. Patent No. 5,684,945 to Chen et al. (hereinafter "Chen"), and further in view of U.S. Patent No. 7,130,807 to Mikurak (hereinafter "Mikurak").

Claims 10, 44, and 85 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Billemaz, in view of U.S. Patent Application Publication No. 2004/0266526 by Herbrich et al. (hereinafter "Herbrich").

Claims 11, 45, and 86 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Billemaz, in view of Chen.

Claims 16-17, 50-51, and 91-92 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Billemaz, in view of U.S. Patent Application Publication No. 2003/0122826 by Eryilmaz et al. (hereinafter "Eryilmaz").

Claim 26 is rejected under 35 U.S.C. § 103(a) as being unpatentable over Billemaz, in view of Guiberson, and further in view of Chen, and further in view of Mikurak.

Claim 27 is rejected under 35 U.S.C. § 103(a) as being unpatentable over Billemaz, in view of Guiberson, and further in view of Herbrich.

Claim 28 is rejected under 35 U.S.C. § 103(a) as being unpatentable over Billemaz, in view of Guiberson, and further in view of Chen.

Claims 33-34 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Billemaz, in view of Guiberson, and further in view of Eryilmaz.

Claims 53, 57-58, 60, 65-66, and 68-70 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Eryilmaz, in view of Billemaz.

Claims 54-56, 59, 64, and 67 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Eryilmaz, in view of Billemaz, and further in view of Guiberson.

Claim 61 is rejected under 35 U.S.C. § 103(a) as being unpatentable over Eryilmaz, in view of Billemaz, and further in view of Chen and Mikurak.

Claim 62 is rejected under 35 U.S.C. § 103(a) as being unpatentable over Eryilmaz, in view of Billemaz, and further in view of Herbrich.

Claim 63 is rejected under 35 U.S.C. § 103(a) as being unpatentable over Eryilmaz, in view of Billemaz, and further in view of Chen.

IV. 35 U.S.C. § 112 Rejections

The Examiner rejects claims 7, 13, 24, 30, 41, 47, 59, 65, 82, and 87 under 35 U.S.C. § 112, second paragraph, as being indefinite for failing to particularly point out and distinctly claim the subject matter which Applicant regards as the invention (Office Action, page 3, § 5).

With respect to claims 7, 24, 41, 59, and 82, the Examiner notes that there is insufficient antecedent basis for "the two or more data collection instruments." Claims 7 and 82 now recite "the two or more of the free-running data modules." Claim 59 now recites "the two or more of the data modules." Claims 24 and 41 now recite "the first set." Applicant respectfully submits that there is sufficient antecedent basis for these amendments. Accordingly, Applicant respectfully requests the Examiner to withdraw the 35 U.S.C. § 112 rejection of claims 7, 24, 41, 59, and 82.

With respect to claims 13, 30, 47, and 65, the Examiner notes that there is insufficient basis for "synchronizing the two or more data modules," "the selected of the two or more data modules," and "synchronize execution of one or more functions." Claim 13 now recites "controlling the two or more of the free-running data modules," "the two or more of the free-running data modules," and "synchronize execution of the at least one of the functions." Claim 65 now recites "controlling the two or more of the data modules," "the two or more of the data modules," and "synchronize execution of the at least one of the functions." Claims 30 and 47 now recite "controlling the first set" and "the first set." In addition, claim 30 recites "synchronize execution of the snapshot function" and claim 47 recites "synchronize execution of the suspend function." Applicant respectfully submits that there is sufficient antecedent basis for these features. Accordingly, Applicant respectfully requests the Examiner to withdraw the 35 U.S.C. § 112 rejection of claims 13, 30, 47, and 65.

With respect to claim 87, the Examiner notes that there is insufficient basis for "the method." Claim 87 no longer recites "the method." Accordingly, Applicant respectfully requests the Examiner to withdraw the 35 U.S.C. § 112 rejection of claim 87.

V. **35 U.S.C. § 102 Rejection**

The Examiner rejects claims 1, 5-6, 8, 13-14, 36, 40, 42, 47-48, 72, 74, 76, 80-81, 83 and 88-89 as being anticipated by Billemaz (Office Action, page 5, § 7). Applicant respectfully traverses the rejection for at least the reasons presented below.

A. **Claim 1**

Amended claim 1 recites:

> In a simulation environment, a computer-implemented method for controlling collection of data generated by a dynamic system model, comprising:
>> providing the dynamic system model in the simulation environment on a computer system;
>> providing a controller system separate from the dynamic system model on the computer system, the controller system including:

at least two free-running data modules, the free-running
data modules communicatively coupled to collect data from
the dynamic system model,
one or more functions, the one or more functions executed
by at least two of the free-running data modules, and
at least one controller controlling two or more of the free-
running data modules;
activating the dynamic system model, thereby generating
data; and
controlling two or more of the free-running data modules
to simultaneously execute at least one of the functions to achieve
synchronization of at least one of collection or analysis of the
generated data at a point in time, the controlling performed using
the at least one controller.

Applicant respectfully submits that Billemaz fails to disclose or suggest at least the
following feature of independent claim 1: "controlling two or more of the free-running data
modules to simultaneously execute at least one of the functions to achieve synchronization of at
least one of collection or analysis of the generated data at a point in time, the controlling
performed using the at least one controller."

Claim 1 as amended recites that the at least two data modules are "free-running data
modules." Thus, the controlled data modules are free-running data modules. In contrast,
Billemaz's slave probes collect data during a simulation only when they receive a start action
signal from a probe master. Thus, Billemaz's slave probes are not free-running, as recited in
claim 1.

Furthermore, Billemaz's slave probes can only act synchronously since the slave probes
only act upon receiving action signals from the probe master. In contrast, free-running data
modules are not generally controlled synchronously during a simulation. Therefore, the
controller system of claim 1 provides previously unavailable synchronization mechanisms to
free-running data modules. Since Billemaz's slave probes can only act synchronously,
Billemaz's probe master controlling multiple slave probes is not equivalent to the at least one
controller of claim 1 controlling two or more free-running data modules, which would be able to
be controlled (i.e. started and stopped) independently.

For at least the reasons set forth above, Billemaz fails to disclose or suggest each and
every feature of claim 1. Accordingly, Applicant respectfully requests the Examiner to
withdraw the above 35 U.S.C. § 102 rejection of claim 1.

B. Claims 5-6, 8, and 13-14

Claims 5-6, 8, and 13-14 depend from and incorporate all of the features of claim 1. Accordingly, claims 5-6, 8, and 13-14 are patentable for at least the reasons set forth above for claim 1.

In addition, with respect to claim 5, Applicant respectfully submits that Billemaz does not disclose or suggest that "the at least one of the functions includes a suspend function" and "the controlling simultaneously executes the suspend function at the two or more of the free-running data modules to synchronously pause collection of the generated data by the controlled data modules while the dynamic system model continues to operate."

The Examiner alleges that Billemaz discloses a suspend function. Applicant respectfully disagrees. As recited in claim 5, a suspend function "pause[s] collection of the generated data by the controlled data modules." Applicant respectfully submits that the ordinary and customary meaning of *pause* is a temporary suspension of an action. Thus, "paus[ing] collection of the generated data by the controlled data modules" is distinct from stopping the data modules from collecting data because when a data module stops collecting data, there is an intended end to the data collection, not a temporary suspension of the data collection. Billemaz merely describes a stop action to intentionally end, not temporarily suspend, the data collection (Billemaz, ¶ [0011]). Applicant respectfully submits that multiple uses of a stop action is not equivalent to providing a suspend function because each stop action intentionally ends a different data collection period. In contrast, a suspend action may be performed multiple times within the same data collection period. Thus, Billemaz does not disclose a suspend action that would pause (i.e., temporarily suspend) data collection.

For at least the reasons set forth above, Billemaz fails to disclose or suggest each and every feature of claims 5-6, 8, and 13-14. Accordingly, Applicant respectfully requests the Examiner to withdraw the above 35 U.S.C. § 102 rejection of claims 5-6, 8, and 13-14.

C. Claims 36, 40, 42, and 47-48

Applicant respectfully submits that Billemaz fails to disclose or suggest at least the following features of independent claim 36: "controlling a first two or more of the at least two

free-running data modules to simultaneously execute the suspend function to synchronously pause collection of the generated data by the controlled free-running data modules while the dynamic system model continues to operate, the controlling performed using the at least one controller" where the two or more of the data modules are "free-running data modules" and providing "a suspend function."

As discussed above with respect to claims 1 and 5, Billemaz merely discusses a stop action, and is silent with respect to a separate suspend function. In addition, Billemaz's slave probes are not "free-running data modules." Thus, Billemaz cannot disclose "controlling a first two or more of the at least two free-running data modules to simultaneously execute the suspend function to synchronously pause collection of the generated data by the controlled free-running data modules while the dynamic system model continues to operate, the controlling performed using the at least one controller," as recited in claim 36.

Claims 40, 42, and 47-48 depend from and incorporate all of the features of claim 36. Accordingly, claims 40, 42, and 47-48 are patentable for at least the reasons set forth above for claim 36.

For at least the reasons set forth above, Billemaz fails to disclose each and every feature of claims 36, 40, 42, and 47-48. Accordingly, Applicant respectfully requests the Examiner to withdraw the above 35 U.S.C. § 102 rejection of claims 36, 40, 42, and 47-48.

D. Claim 72

Applicant respectfully submits that Billemaz fails to disclose or suggest each and every feature of independent claim 72. For example, Billemaz does not disclose "at least one controller to control two or more of the free-running data modules to simultaneously execute at least one of the functions to achieve synchronization of at least one of collection or analysis of the generated data at a point in time" because Billemaz's slave probes are not free-running.

For at least the reasons set forth above, Applicant respectfully requests the Examiner to withdraw the above 35 U.S.C. § 102 rejection of claim 72.

E. Claim 74

Applicant respectfully submits that Billemaz fails to disclose or suggest each and every feature of independent claim 74. For example, Billemaz does not disclose "at least one controller to control two or more of the data modules to simultaneously execute the suspend function to synchronously pause collection of the generated data by the controlled data modules while the dynamic system model continues to operate, the controlling performed between the starting and the stopping of the controlled modules" where "each of the at least two data modules [is] operating in one of a free-running mode or a triggered mode, wherein a data module operating in triggered mode starts data collection when a trigger event occurs and stops data collection when a stop event occurs, the trigger event being external to the data module, the stop event being internal to the data module."

As discussed above with respect to claim 1, Billemaz's slave probes are not free-running. In addition, Billemaz's slave probes do not operate in the triggered mode of claim 74 because all of the slave probe actions, including both the start action and the stop action, are controlled by the probe master. In contrast, data modules operating in the triggered mode of claim 74 may be triggered to start collecting data by an external event, but they stop collecting data due to an internal event, such as a preset time or the filling of a display (Specification, page 15, lines 1-4). Since Billemaz's slave probes stop collecting data due to an event external to the data module, so that they receive the stop action command from an external entity (i.e., the probe master), Billemaz's slave probes do not operate in the triggered mode of claim 74.

Furthermore, the suspend function, which is executed when the at least one controller controls "two or more of the data modules to simultaneously execute the suspend function to synchronously pause collection of the generated data by the controlled data modules," is distinguishable from the inherent stop function of the data modules operating in the triggered mode of claim 1. As discussed above, Billemaz merely describes a stop function and does not discuss a suspend function that is distinguishable from the stop function. Accordingly, Billemaz does not disclose a suspend function or disclose free-running data modules or data modules operating in the triggered mode of claim 74.

For at least the reasons set forth above, Applicant respectfully requests the Examiner to withdraw the above 35 U.S.C. § 102 rejection of claim 74.

F. Claims 76, 80-81, 83, and 88-89

Applicant respectfully submits that Billemaz fails to disclose or suggest each and every feature of independent claim 76. For example, Billemaz does not disclose "controlling two or more of the free-running data modules to simultaneously execute at least one of the functions to achieve synchronization of at least one of collection or analysis of the generated data at a point in time, the controlling performed using the at least one controller" because Billemaz's slave probes are not free-running.

Claims 80-81, 83, and 88-89 depend from and incorporate all of the features of claim 76. Accordingly, claims 80-81, 83, and 88-89 are patentable for at least the reasons set forth above for claim 76.

For at least the reasons set forth above, Billemaz fails to disclose each and every feature of claims 76, 80-81, 83, and 88-89. Accordingly, Applicant respectfully requests the Examiner to withdraw the above 35 U.S.C. § 102 rejection of claims 76, 80-81, 83, and 88-89.

VI. 35 U.S.C. § 103 Rejections

A. Claims 2-4, 7, 12, 15, 19-25, 29-32, 37-39, 41, 46, 49, 73, 77-79, 82, 87, and 90

The Examiner rejects claims 2-4, 7, 12, 15, 19-25, 29-32, 37-39, 41, 46, 49, 73, 77-79, 82, 87, and 90 as being unpatentable over Billemaz, in view of Guiberson (Office Action, page 12, § 10).

i. Claim 2

Claim 2 depends from and incorporates all of the features of claim 1.

As discussed above with respect to claim 1, Billemaz does not disclose or suggest "controlling two or more of the free-running data modules to simultaneously execute at least one of the functions to achieve synchronization of at least one of collection or analysis of the

generated data at a point in time, the controlling performed using the at least one controller."
Guiberson does not remedy the shortcomings of Billemaz with respect to claim 1 because
Guiberson does not disclose or suggest at least one controller "controlling two or more of the
free-running data modules." Accordingly, Billemaz and Guiberson, alone or in any reasonable
combination, do not disclose or suggest each and every feature of claim 2.

In addition, Applicant respectfully submits that Billemaz and Guiberson, alone or in any
reasonable combination, do not disclose or suggest at least the following feature of claim 2: "the
snapshot function freezing the display of the data collected at the free-running data module that
executes the snapshot function."

The Examiner alleges that Guiberson discloses a snapshot function, which the Examiner
acknowledges is not found in Billemaz (Office Action, page 9, § 10.1). Applicant respectfully
disagrees.

Guiberson describes a process in which a data display window 210 displaying data 212 is
re-displayed in a dialog box 220 that includes a data display area 222 displaying data 212'
(Guiberson, col. 4, lines 49-67; Fig. 3). Thus, although Guiberson describes "freezing" the data
212 in the display 210, at least a portion of the data 212 is actually still being displayed as data
212' in real-time in data display area 222. Applicant respectfully submits that since Guiberson
continues to display the data collected in real-time, Guiberson does not disclose or suggest
"freezing the display of the data collected." That is, Applicant respectfully submits that the
ordinary and customary meaning of "freezing the display of the data collected" as interpreted by
persons of ordinary skill in the art would not include a process that continues to display the data
in real-time in the foreground while placing a static picture of the data in the background.
Accordingly, Guiberson does not disclose or suggest a snapshot function, as recited in claim 2.

For at least the reasons set forth above, Applicant respectfully requests reconsideration
and allowance of claim 2.

ii. Claims 3 and 4

Claims 3 and 4 depend from and incorporate all of the features of claim 2. Accordingly, claims 3 and 4 are patentable for at least the reasons set forth above for claim 2.

In addition, with respect to claim 3, the Examiner acknowledges that Billemaz does not disclose or suggest "providing the display of data collected while data continues to be collected without updating the display," but the Examiner's position is that Guiberson teaches this feature (Office Action, page 13). Applicant respectfully disagrees because, as discussed above with respect to claim 2, Guiberson <u>continues to update</u> the display.

Furthermore, with respect to claim 4, the Examiner acknowledges that Billemaz does not disclose or suggest "manipulating at least one of the frozen displays of data collected while data continues to be collected," but the Examiner's position is that Guiberson teaches this feature (Office Action, page 14). Applicant respectfully disagrees.

Applicant respectfully submits that Guiberson does not disclose or suggest "manipulating at least one of the frozen displays of data collected" because Guiberson merely displays a static picture of the data in the background behind a modal dialog. Thus, it is not possible to access or manipulate the static picture. The modal dialog in the foreground shows a <u>real-time</u> display of the data. Thus, the controls in the dialog do not enable the manipulation of a <u>frozen</u> display of data collected. Accordingly, Guiberson does not disclose or suggest this feature.

For at least the reasons set forth above, Applicant respectfully requests reconsideration and allowance of claims 3 and 4.

iii. Claims 7, 12, and 15

Claims 7, 12, and 15 depend from and incorporate all of the features of claim 1.

As discussed above with respect to claim 2, Billemaz and Guiberson, alone or in any reasonable combination, do not disclose or suggest at least "controlling two or more of the free-running data modules to simultaneously execute at least one of the functions to achieve synchronization of at least one of collection or analysis of the generated data at a point in time,

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the controlling performed using the at least one controller," as recited in claim 1. Accordingly, Billemaz and Guiberson, alone or in any reasonable combination, do not disclose each and every feature of claims 7, 12, and 15.

In addition, with respect to claim 7, the Examiner acknowledges that Billemaz does not disclose or suggest "directing a review of data collected by the two or more of the free-running data modules by utilizing a review function," but the Examiner's position is that Guiberson teaches this feature (Office Action, page 14). Applicant respectfully disagrees. Claim 7 recites a "review of data collected." In contrast, Guiberson discusses making adjustments (such as the changing the "trigger levels, vertical scale adjustments, horizontal scale adjustments, etc.") to a real-time display of the data (Guiberson, col. 1, lines 36-38; col. 4, lines 25-27; Fig. 4, Item 415 and accompanying text in col. 5, lines 33-36). Applicants respectfully submit that viewing a real-time display of data is not equivalent to reviewing data that has been collected. Thus, Guiberson does not disclose or suggest a "review of data collected."

For at least the reasons set forth above, Applicant respectfully requests reconsideration and allowance of claims 7, 12, and 15.

iv. Claims 19-25 and 29-32

Applicant respectfully submits that Billemaz and Guiberson, alone or in any reasonable combination, fail to disclose or suggest at least the following feature of claim 19: "controlling a first set of two or more of the data modules to simultaneously execute the snapshot function to synchronously freeze the displays of the data collected by the controlled data modules, the freezing occurring while the dynamic system model continues to execute and the generated data continues to be collected by the controlled data modules, the controlling performed using the at least one controller between the starting and the stopping of the first set" where "each of the at least two data modules [is] operating in one of a free-running mode or a triggered mode, wherein a data module operating in triggered mode starts data collection when a trigger event occurs and stops data collection when a stop event occurs, the trigger event being external to the data module, the stop event being internal to the data module."

As discussed above with respect to claim 74, Billemaz does not disclose or suggest that the slave probes operate in "one of a free-running mode or a triggered mode, wherein a data module operating in triggered mode starts data collection when a trigger event occurs and stops data collection when a stop event occurs, the trigger event being external to the data module, the stop event being internal to the data module." Guiberson fails to correct the deficiency of Billemaz since Guiberson does not discuss a controller that controls multiple data modules. Thus, Billemaz and Guiberson, alone or in any reasonable combination, fail to "controlling a first set of two or more of the data modules" with the above-described features.

Furthermore, as discussed above with respect to claim 2, the Examiner acknowledges that Billemaz does not discuss a snapshot function, and Guiberson also does not disclose or suggest a snapshot function since the display in Guiberson continues to display real-time data after the alleged "freezing."

For at least the reasons set forth above, Billemaz and Guiberson, alone or in any reasonable combination, do not disclose or suggest all of the features of claim 19.

Claims 20-25 and 29-32 depend from and incorporate all of the features of claim 19. Accordingly, claims 20-25 and 29-32 are patentable for at least the reasons set forth above for claim 19.

In addition, with respect to claim 22, Applicant respectfully submits that Billemaz and Guiberson, alone or in any reasonable combination, do not disclose or suggest "controlling a second set of two or more of the data modules to simultaneously execute a suspend function to synchronously pause collection of the generated data by the second set while the dynamic system model continues to operate, the controlling performed using the at least one controller, the second set differing from the first two set by at least one data module."

Guiberson does not discuss controllers controlling multiple sets of two or more data modules. In addition, Billemaz states that a "probe master (PM) propagates action signals to a set of slave probes (SPs)" (Billemaz, ¶[0010]) (emphasis added). Thus, Billemaz's probe master can only control a single set of slave probes. In contrast, the at least one controller of claim 22 can control a first set of data modules to execute a snapshot function and control a second set of

data modules to execute a suspend function, where "the second set differs from the first set by at least one data module." Billemaz is silent with respect to such a feature.

For at least the reasons set forth above, Applicant respectfully submits that Billemaz and Guiberson, alone or in any reasonable combination, do not disclose or suggest each and every feature of claims 19-25 and 29-32. Accordingly, Applicant respectfully requests reconsideration and allowance of claims 19-25 and 29-32.

v. **Claims 37-39, 41, 46, and 49**

Claims 37-39, 41, 46, and 49 depend from and incorporate all of the features of claim 36.

As discussed above with respect to claim 36, Billemaz does not disclose or suggest "controlling a first set of two or more of the at least two free-running data modules to simultaneously execute the suspend function to synchronously pause collection of the generated data by the controlled free-running data modules while the dynamic system model continues to operate, the controlling performed using the at least one controller." Guiberson does not remedy the deficiency of Billemaz since Guiberson is silent with respect to at least one controller controlling a set of two or more free-running data modules. Thus, Billemaz and Guiberson, alone or in any reasonable combination, do not disclose or suggest all of the features of claims 37-39, 41, 46, and 49.

In addition, with respect to claim 37, Applicant respectfully submits Billemaz and Guiberson, alone or in any reasonable combination, do not disclose or suggest a snapshot function because, as the Examiner acknowledges, Billemaz does not disclose or suggest a snapshot function, and Guiberson also does not disclose or suggest a snapshot function since the display in Guiberson continues to display real-time data after the alleged "freezing."

Furthermore, with respect to claim 37, Applicants respectfully submit that neither Billemaz nor Guiberson disclose or suggest at least one controller that can "control a first set of two or more of the at least two free-running data modules to simultaneously execute the suspend function" and control a "second set of two or more of the at least two free-running data modules

to simultaneously execute a snapshot function," where "the second set differs from the first set by at least one data module" for at least the reasons set forth above with respect to claim 22.

For at least the reasons set forth above, Billemaz and Guiberson, alone or in any reasonable combination, do not disclose or suggest all of the features of claims 37-39, 41, 46, and 49. Accordingly, Applicant respectfully requests reconsideration and allowance of claims 37-39, 41, 46, and 49.

vi. Claim 73

Applicant respectfully submits that Billemaz and Guiberson, alone or in any reasonable combination, fail to disclose or suggest at least the following feature of claim 73: "at least one controller to control two or more of the free-running data modules to simultaneously execute the snapshot function to synchronously freeze the displays of the data collected by the controlled data modules, the freezing occurring while the dynamic system model continues to execute and the generated data continues to be collected by the controlled data modules."

As discussed above with respect to claim 2, neither Billemaz nor Guiberson discloses or suggests controlling two or more free-running data modules. Furthermore, as also discussed above with respect to claim 2, the Examiner acknowledges that Billemaz does not discuss a snapshot function, and Guiberson also does not disclose or suggest a snapshot function since the display in Guiberson _continues_ to display real-time data after the alleged "freezing."

For at least the reasons set forth above, Billemaz and Guiberson, alone or in any reasonable combination, do not disclose or suggest all of the features of claim 73. Accordingly, Applicant respectfully requests reconsideration and allowance of claim 73.

vii. Claims 77-79, 82, 87, and 90

Claims 77-79, 82, 87, and 90 depend from and incorporate all of the features of claim 76.

As discussed above with respect to claim 76, Billemaz does not disclose or suggest "controlling two or more of the free-running data modules to simultaneously execute at least one of the functions to achieve synchronization of at least one of collection or analysis of the

generated data at a point in time, the controlling performed using the at least one controller." Guiberson does not remedy the deficiency of Billemaz since Guiberson is silent with respect to at least one controller controlling two or more free-running data modules. Thus, Billemaz and Guiberson, alone or in any reasonable combination, do not disclose or suggest all of the features of claims 77-79, 82, 87, and 90.

In addition, Applicant respectfully submits that Billemaz and Guiberson, alone or in any reasonable combination, do not disclose or suggest at least the following feature of claim 77: "the snapshot function freezing the display of the data collected at the free-running data module that executes the snapshot function." The Examiner acknowledges that Billemaz does not disclose or suggest a snapshot function. In addition, as discussed above with respect to claim 2, Guiberson also does not disclose or suggest a snapshot function because Guiberson does not disclose "freezing the display of the data collected" since Guiberson continues to display the data in real-time after the alleged "freezing." Thus, Billemaz and Guiberson, alone or in any reasonable combination, do not disclose or suggest this feature.

Moreover, with respect to claim 79, Applicant respectfully submits that Billemaz and Guiberson, alone or in any reasonable combination, do not disclose or suggest "manipulating at least one of the frozen displays of data collected while data continues to be collected." As discussed above with respect to claim 4, Guiberson's static image of the data collected cannot be manipulated since it is merely a background image behind a modal dialog. Since Billemaz also does not disclose or suggest this feature, the combination of Billemaz and Guiberson does not disclose or suggest this feature.

Furthermore, with respect to claim 82, Applicant respectfully submits that Billemaz and Guiberson, alone or in any reasonable combination, do not disclose or suggest "directing a review of data collected by the two or more data modules by utilizing a review function." As discussed above with respect to claim 7, Guiberson does not disclose a review function that enables one to review data collected since Guiberson merely discusses displaying data in real-time. Since Billemaz also does not disclose or suggest this feature, the combination of Billemaz and Guiberson does not disclose or suggest this feature.

For at least the reasons set forth above, Billemaz and Guiberson, alone or in any reasonable combination, do not disclose or suggest all of the features of claims 77-79, 82, 87, and 90. Accordingly, Applicant respectfully requests reconsideration and allowance of claims 77-79, 82, 87, and 90.

B. Claims 9, 43, and 84

The Examiner rejects claims 9, 43, and 84 as being unpatentable over Billemaz, in view of Chen, and further in view of Mikurak (Office Action, page 23, § 11).

Claim 9 depends from and incorporates all of the features of claim 1. Claim 43 depends from and incorporates all of the features of claim 36. Claim 84 depends from and incorporates all of the features of claim 76.

As discussed above with respect to claims 1, 36, and 76, Billemaz fails to disclose or suggest at least:

> "controlling two or more of the free-running data modules to simultaneously execute at least one of the functions to achieve synchronization of at least one of collection or analysis of the generated data at a point in time, the controlling performed using the at least one controller," as recited in claims 1 and 76, and

> "controlling a first set of two or more of the at least two free-running data modules to simultaneously execute the suspend function to synchronously pause collection of the generated data by the controlled free-running data modules while the dynamic system model continues to operate, the controlling performed using the at least one controller," as recited in claim 36.

Chen and Mikurak fail to cure the shortcomings of Billemaz with respect to claims 1, 36, and 76. Neither Chen nor Mikurak disclose or suggest a controller system in which the controller is used to control two or more of the free-running data modules "to simultaneously execute at least one of the functions to achieve synchronization of at least one of collection or analysis of the generated data at a point in time." Thus, Chen and Mikurak cannot disclose or suggest controlling a first set of two or more of the free-running data modules "to

simultaneously execute the suspend function to synchronously pause collection of the generated data by the controlled free-running data modules while the dynamic system model continues to operate." Since Billemaz, Chen, and Mikurak, alone or in any reasonable combination, do not disclose or suggest each and every feature of claims 1, 36, and 76, Billemaz, Chen, and Mikurak, alone or in any reasonable combination, cannot disclose or suggest all of the features of dependent claims 9, 43, and 84. Accordingly, Applicant respectfully requests reconsideration and allowance of claims 9, 43, and 84.

C. **Claims 10, 44, and 85**

The Examiner rejects claims 10, 44, and 85 as being unpatentable over Billemaz, in view of Herbrich (Office Action, page 24, § 12).

Claim 10 depends from and incorporates all of the features of claim 1. Claim 44 depends from and incorporates all of the features of claim 36. Claim 85 depends from and incorporates all of the features of claim 76.

As discussed above with respect to claims 1, 36, and 76, Billemaz fails to disclose or suggest at least:

> "controlling two or more of the free-running data modules to simultaneously execute at least one of the functions to achieve synchronization of at least one of collection or analysis of the generated data at a point in time, the controlling performed using the at least one controller," as recited in claims 1 and 76, and

> "controlling a first set of two or more of the at least two free-running data modules to simultaneously execute the suspend function to synchronously pause collection of the generated data by the controlled free-running data modules while the dynamic system model continues to operate, the controlling performed using the at least one controller," as recited in claim 36.

Herbrich fails to cure the shortcomings of Billemaz with respect to claims 1, 36, and 76. Herbrich does not disclose or suggest a controller system in which the controller is used to control two or more of the free-running data modules "to simultaneously execute at least one of

the functions to achieve synchronization of at least one of collection or analysis of the generated data at a point in time." Thus, Herbrich cannot disclose or suggest controlling a first set of two or more of the free-running data modules "to simultaneously execute the suspend function to synchronously pause collection of the generated data by the controlled free-running data modules while the dynamic system model continues to operate." Since Billemaz and Herbrich, alone or in any reasonable combination, do not disclose or suggest each and every feature of claims 1, 36, and 76, Billemaz and Herbrich, alone or in any reasonable combination, cannot disclose or suggest each and every feature of dependent claims 10, 44, and 85.

Furthermore, claims 10, 44, and 85 recite "directing a buffering mode to be utilized during data collection from one of a circular buffering mode, a finite buffering mode, and a buffer extension mode by executing a data buffering mode function." The Examiner alleges that Herbrich teaches this feature (Office Action, pages 23-24, § 14.1-3). Applicants respectfully disagree. Herbrich discloses the use of circular and linear buffers. However, Herbrich fails to disclose or suggest that the use of a buffer is <u>directed</u> "by <u>executing</u> a data buffering mode <u>function</u>," as recited in claims 10, 44 and 85.

For at least the reasons set forth above, Applicant respectfully submits that Billemaz and Herbrich, alone or in any reasonable combination, fail to disclose or suggest each and every feature of claims 10, 44, and 85. Accordingly, Applicant respectfully requests reconsideration and allowance of claims 10, 44, and 85.

D. <u>Claims 11, 45 and 86</u>

The Examiner rejects claims 11, 45 and 86 as being unpatentable over Billemaz, in view of Chen (Office Action, page 26, § 13).

Claim 11 depends from and incorporates all of the features of claim 1. Claim 45 depends from and incorporates all of the features of claim 36. Claim 86 depends from and incorporates all of the features of claim 76.

As discussed above with respect to claims 1, 36, and 76, Billemaz fails to disclose or suggest at least:

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"controlling two or more of the free-running data modules to simultaneously execute at least one of the functions to achieve synchronization of at least one of collection or analysis of the generated data at a point in time, the controlling performed using the at least one controller," as recited in claims 1 and 76, and

"controlling a first set of two or more of the at least two free-running data modules to simultaneously execute the suspend function to synchronously pause collection of the generated data by the controlled free-running data modules while the dynamic system model continues to operate, the controlling performed using the at least one controller," as recited in claim 36.

Chen fails to cure the shortcomings of Billemaz with respect to claims 1, 36, and 76. Chen does not disclose or suggest a controller system in which the controller is used to control two or more of the free-running data modules "to simultaneously execute at least one of the functions to achieve synchronization of at least one of collection or analysis of the generated data at a point in time." Thus, Chen cannot disclose or suggest controlling a first set of two or more of the free-running data modules "to simultaneously execute the suspend function to synchronously pause collection of the generated data by the controlled free-running data modules while the dynamic system model continues to operate." Since Billemaz and Chen, alone or in any reasonable combination, do not disclose or suggest each and every feature of claims 1, 36, and 76, Billemaz and Chen, alone or in any reasonable combination, cannot disclose or suggest each and every feature of dependent claims 11, 45 and 86. Accordingly, Applicant respectfully requests reconsideration and allowance of claims 11, 45, and 86.

E. **Claims 16-17, 50-51, and 91-92**

The Examiner rejects claims 16-17, 50-51, and 91-92 as being unpatentable over Billemaz, in view of Eryilmaz (Office Action, page 27, § 14).

Claims 16-17 depend from and incorporate all of the features of claim 1. Claims 50-51 depend from and incorporate all of the features of claim 36. Claims 91-92 depend from and incorporate all of the features of claim 76.

As discussed above with respect to claims 1, 36, and 76, Billemaz fails to disclose or suggest at least:

> "controlling two or more of the free-running data modules to simultaneously execute at least one of the functions to achieve synchronization of at least one of collection or analysis of the generated data at a point in time, the controlling performed using the at least one controller," as recited in claims 1 and 76, and

> "controlling a first set of two or more of the at least two free-running data modules to simultaneously execute the suspend function to synchronously pause collection of the generated data by the controlled free-running data modules while the dynamic system model continues to operate, the controlling performed using the at least one controller," as recited in claim 36.

Eryilmaz fails to cure the shortcomings of Billemaz with respect to claims 1, 36, and 76. Eryilmaz does not disclose or suggest a controller system in which the controller is used to control two or more of the free-running data modules "to simultaneously execute at least one of the functions to achieve synchronization of at least one of collection or analysis of the generated data at a point in time." Thus, Eryilmaz cannot disclose or suggest controlling a first set of two or more of the free-running data modules "to simultaneously execute the suspend function to synchronously pause collection of the generated data by the controlled free-running data modules while the dynamic system model continues to operate." Since Billemaz and Eryilmaz, alone or in any reasonable combination, do not disclose or suggest each and every feature of claims 1, 36, and 76, Billemaz and Eryilmaz, alone or in any reasonable combination, cannot disclose or suggest each and every feature of dependent claims 16-17, 50-51, and 91-92.

Accordingly, Applicant respectfully requests reconsideration and allowance of claims 16-17, 50-51, and 91-92.

F. Claim 26

The Examiner rejects claim 26 as being unpatentable over Billemaz, in view of Guiberson, and further in view of Chen, and further in view of Mikurak (Office Action, page 29, § 15).

Claim 26 depends from and incorporates all of the features of claim 25.

As discussed above with respect to claim 25, Billemaz and Guiberson, alone or in any reasonable combination, do not disclose or suggest each and every feature of claim 25. Chen and Mikurak do not cure the shortcomings of Billemaz and Guiberson, with respect to claim 25. For example, Chen and Mikurak do not disclose or suggest "controlling a first set of two or more of the data modules to simultaneously execute the snapshot function to synchronously freeze the displays of the data collected by the controlled data modules, the freezing occurring while the dynamic system model continues to execute and the generated data continues to be collected by the controlled data modules, the controlling performed using the at least one controller between the starting and the stopping of the first set" where "each of the at least two data modules [is] operating in one of a free-running mode or a triggered mode, wherein a data module operating in triggered mode starts data collection when a trigger event occurs and stops data collection when a stop event occurs, the trigger event being external to the data module, the stop event being internal to the data module."

For at least the reasons set forth above, Applicant respectfully submits that Billemaz, Guiberson, Chen, and Mikurak, alone or in any reasonable combination, do not disclose or suggest each and every feature of claim 26. Accordingly, Applicant respectfully requests reconsideration and allowance of claim 26.

G. Claim 27

The Examiner rejects claim 27 as being unpatentable over Billemaz, in view of Guiberson, and further in view of Herbrich (Office Action, page 29, § 16).

Claim 27 depends from and incorporates all of the features of claim 19.

As discussed above with respect to claim 19, Billemaz and Guiberson, alone or in any reasonable combination, do not disclose or suggest each and every feature of claim 19. Herbrich does not cure the shortcomings of Billemaz and Guiberson with respect to claim 19. For example, Herbrich does not disclose or suggest "controlling a first set of two or more of the data modules to simultaneously execute the snapshot function to synchronously freeze the displays of the data collected by the controlled data modules, the freezing occurring while the dynamic system model continues to execute and the generated data continues to be collected by the controlled data modules, the controlling performed using the at least one controller between the starting and the stopping of the first set" where "each of the at least two data modules [is] operating in one of a free-running mode or a triggered mode, wherein a data module operating in triggered mode starts data collection when a trigger event occurs and stops data collection when a stop event occurs, the trigger event being external to the data module, the stop event being internal to the data module."

For at least the reasons set forth above, Applicant respectfully submits that Billemaz, Guiberson, and Herbrich, alone or in any reasonable combination, do not disclose or suggest each and every feature of claim 27. Accordingly, Applicant respectfully requests reconsideration and allowance of claim 27.

H. Claim 28

The Examiner rejects claim 28 as being unpatentable over Billemaz, in view of Guiberson, and further in view of Chen (Office Action, page 30, § 17).

Claim 28 depends from and incorporates all of the features of claim 19.

As discussed above with respect to claim 19, Billemaz and Guiberson, alone or in any reasonable combination, do not disclose or suggest each and every feature of claim 19. Chen does not cure the shortcomings of Billemaz and Guiberson with respect to claim 19. For example, Chen does not disclose or suggest "controlling a first set of two or more of the data modules to simultaneously execute the snapshot function to synchronously freeze the displays of the data collected by the controlled data modules, the freezing occurring while the dynamic system model continues to execute and the generated data continues to be collected by the

controlled data modules, the controlling performed using the at least one controller between the starting and the stopping of the first set" where "each of the at least two data modules [is] operating in one of a free-running mode or a triggered mode, wherein a data module operating in triggered mode starts data collection when a trigger event occurs and stops data collection when a stop event occurs, the trigger event being external to the data module, the stop event being internal to the data module."

For at least the reasons set forth above, Applicant respectfully submits that Billemaz, Guiberson, and Chen, alone or in any reasonable combination, do not disclose or suggest each and every feature of claim 28. Accordingly, Applicant respectfully requests reconsideration and allowance of claim 28.

I. <u>Claims 33-34</u>

The Examiner rejects claims 33-34 as being unpatentable over Billemaz, in view of Guiberson, and further in view of Eryilmaz (Office Action, page 30, § 18).

Claims 33-34 depend from and incorporate all of the features of claim 19.

As discussed above with respect to claim 19, Billemaz and Guiberson, alone or in any reasonable combination, do not disclose or suggest each and every feature of claim 19. Eryilmaz does not cure the shortcomings of Billemaz and Guiberson with respect to claim 19. For example, Eryilmaz does not disclose or suggest "controlling a first set of two or more of the data modules to simultaneously execute the snapshot function to synchronously freeze the displays of the data collected by the controlled data modules, the freezing occurring while the dynamic system model continues to execute and the generated data continues to be collected by the controlled data modules, the controlling performed using the at least one controller between the starting and the stopping of the first set" where "each of the at least two data modules [is] operating in one of a free-running mode or a triggered mode, wherein a data module operating in triggered mode starts data collection when a trigger event occurs and stops data collection when a stop event occurs, the trigger event being external to the data module, the stop event being internal to the data module."

For at least the reasons set forth above, Applicant respectfully submits that Billemaz, Guiberson, and Eryilmaz, alone or in any reasonable combination, do not disclose or suggest each and every feature of claims 33-34. Accordingly, Applicant respectfully requests reconsideration and allowance of claims 33-34.

J. Claims 53, 57-58, 60, 65-66, and 68-70

The Examiner rejects claims 53, 57-58, 60, 65-66, and 68-70 as being unpatentable over Eryilmaz, in view of Billemaz (Office Action, page 31, § 19).

Applicant respectfully submits that Eryilmaz and Billemaz, alone or in any reasonable combination, do not disclose or suggest at least the following feature of claim 53: "controlling two or more of the data modules to simultaneously execute at least one of the functions to achieve synchronization of at least one of collection or analysis of the generated data at a point in time, the controlling performed using the at least one controller between the starting and the stopping of the controlled data modules" where "each of the at least two data modules [is] operating in one of a free-running mode or a triggered mode, wherein a data module operating in triggered mode starts data collection when a trigger event occurs and stops data collection when a stop event occurs, the trigger event being external to the data module, the stop event being internal to the data module." The Examiner acknowledges that Eryilmaz does not disclose or suggest this feature, but alleges that Billemaz does (Office Action, pages 32-33). Applicants respectfully disagree.

As discussed above with respect to claim 74, Billemaz's slave probes are not operating in either a free-running mode or the triggered mode recited in claims 74 and 53. Thus, Eryilmaz and Billemaz, alone or in any reasonable combination, do not disclose or suggest each and every feature of claim 53.

Claims 57-58, 60, 65-66, and 68-70 depend from and incorporate all of the features of claim 53. Thus, claims 57-58, 60, 65-66, and 68-70 are patentable for at least the reasons set forth above for claim 53.

Accordingly, Applicant respectfully requests reconsideration and allowance of claims 53, 57-58, 60, 65-66, and 68-70.

K. Claims 54-56, 59, 64, and 67

The Examiner rejects claims 54-56, 59, 64, and 67 as being unpatentable over Eryilmaz, in view of Billemaz, and further in view of Guiberson (Office Action, page 35, § 20).

Claims 54-56, 59, 64, and 67 depend from and incorporate all of the features of claim 53.

As discussed above with respect to claim 53, Eryilmaz and Billemaz, alone or in any reasonable combination, do not disclose or suggest each and every feature of claim 53. Guiberson does not cure the shortcomings of Eryilmaz and Billemaz with respect to claim 53. For example, Guiberson does not disclose or suggest "controlling two or more of the data modules to simultaneously execute at least one of the functions to achieve synchronization of at least one of collection or analysis of the generated data at a point in time, the controlling performed using the at least one controller between the starting and the stopping of the controlled data modules" where "each of the at least two data modules [is] operating in one of a free-running mode or a triggered mode, wherein a data module operating in triggered mode starts data collection when a trigger event occurs and stops data collection when a stop event occurs, the trigger event being external to the data module, the stop event being internal to the data module."

In addition, with respect to claim 54, Applicant respectfully submits that Guiberson does not disclose or suggest a "snapshot function freezing the display of the data collected at the data module that executes the snapshot function" because the data continues to be displayed in real-time after the alleged freezing of the data display.

For at least the reasons set forth above, Applicant respectfully submits that Eryilmaz, Billemaz, and Guiberson, alone or in any reasonable combination, do not disclose or suggest each and every feature of claims 54-56, 59, 64, and 67. Accordingly, Applicant respectfully requests reconsideration and allowance of claims 54-56, 59, 64, and 67.

L. Claim 61

The Examiner rejects claim 61 as being unpatentable over Eryilmaz, in view of Billemaz, and further in view of Chen and Mikurak (Office Action, pages 37-38, § 21).

Claim 61 depends from and incorporates all of the features of claim 53.

As discussed above with respect to claim 53, Eryilmaz and Billemaz, alone or in any reasonable combination, do not disclose or suggest each and every feature of claim 53. Chen and Mikurak do not cure the shortcomings of Eryilmaz and Billemaz with respect to claim 53. For example, Chen and Mikurak, alone or in any reasonable combination, do not disclose or suggest "controlling two or more of the data modules to simultaneously execute at least one of the functions to achieve synchronization of at least one of collection or analysis of the generated data at a point in time, the controlling performed using the at least one controller between the starting and the stopping of the controlled data modules" where "each of the at least two data modules [is] operating in one of a free-running mode or a triggered mode, wherein a data module operating in triggered mode starts data collection when a trigger event occurs and stops data collection when a stop event occurs, the trigger event being external to the data module, the stop event being internal to the data module."

For at least the reasons set forth above, Applicant respectfully submits that Eryilmaz, Billemaz, Chen, and Mikurak, alone or in any reasonable combination, do not disclose or suggest each and every feature of claim 61. Accordingly, Applicant respectfully requests reconsideration and allowance of claim 61.

M. Claim 62

The Examiner rejects claim 62 as being unpatentable over Eryilmaz, in view of Billemaz, and further in view of Herbrich (Office Action, page 38, § 22).

Claim 62 depends from and incorporates all of the features of claim 53.

As discussed above with respect to claim 53, Eryilmaz and Billemaz, alone or in any reasonable combination, do not disclose or suggest each and every feature of claim 53. Herbrich

does not cure the shortcomings of Eryilmaz and Billemaz with respect to claim 53. For example, Herbrich does not disclose or suggest "controlling two or more of the data modules to simultaneously execute at least one of the functions to achieve synchronization of at least one of collection or analysis of the generated data at a point in time, the controlling performed using the at least one controller between the starting and the stopping of the controlled data modules" where "each of the at least two data modules [is] operating in one of a free-running mode or a triggered mode, wherein a data module operating in triggered mode starts data collection when a trigger event occurs and stops data collection when a stop event occurs, the trigger event being external to the data module, the stop event being internal to the data module."

For at least the reasons set forth above, Applicant respectfully submits that Eryilmaz, Billemaz, and Herbrich, alone or in any reasonable combination, do not disclose or suggest each and every feature of claim 62. Accordingly, Applicant respectfully requests reconsideration and allowance of claim 62.

N. **Claim 63**

The Examiner rejects claim 63 as being unpatentable over Eryilmaz, in view of Billemaz, and further in view of Chen (Office Action, page 39, § 23).

Claim 63 depends from and incorporates all of the features of claim 53.

As discussed above with respect to claim 53, Eryilmaz and Billemaz, alone or in any reasonable combination, do not disclose or suggest each and every feature of claim 53. Chen does not cure the shortcomings of Eryilmaz and Billemaz with respect to claim 53. For example, Chen does not disclose or suggest "controlling two or more of the data modules to simultaneously execute at least one of the functions to achieve synchronization of at least one of collection or analysis of the generated data at a point in time, the controlling performed using the at least one controller between the starting and the stopping of the controlled modules" where "each of the at least two data modules [is] operating in one of a free-running mode or a triggered mode, wherein a data module operating in triggered mode starts data collection when a trigger event occurs and stops data collection when a stop event occurs, the trigger event being external to the data module, the stop event being internal to the data module."

For at least the reasons set forth above, Applicant respectfully submits that Eryilmaz, Billemaz, and Chen, alone or in any reasonable combination, do not disclose or suggest each and every feature of claim 63. Accordingly, Applicant respectfully requests reconsideration and allowance of claim 63.

CONCLUSION

In view of the above amendments and arguments, Applicant believes the pending application is in condition for allowance. Should the Examiner feel that a teleconference would expedite the prosecution of this application, the Examiner is urged to contact the Applicant's attorney at (617) 227-7400.

Please charge any shortage or credit any overpayment of fees to our Deposit Account No. 12-0080, under Order No. MWS-029RCE. In the event that a petition for an extension of time is required to be submitted herewith, and the requisite petition does not accompany this response, the undersigned hereby petitions under 37 C.F.R. §1.136(a) for an extension of time for as many months as are required to render this submission timely. Any fee due is authorized to be charged to the aforementioned Deposit Account.

Dated: February 17, 2009   Respectfully submitted,

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